

REMARKS

Claims 1-20 are pending in this application. By this amendment, claims 1-3 and 11-14 are amended. Claims 1 and 14 are independent claims.

Claim Rejections – 35 U.S.C. §112

Claims 1-20 were rejected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention.

Claims 1-3 and 11-14 have been amended to obviate the rejection. Withdrawal of the rejection is respectfully requested.

Claim Rejections – 35 U.S.C. §101

Claims 1-20 were rejected under 35 U.S.C. §101. In particular, the Examiner asserts that claims 1 and 14 fail “to recite functional elements as to enable the claimed object model architecture for providing network management for a telecommunication network to achieve some concrete, useful, and tangible results.” Applicants respectfully disagree and traverse these rejections.

Applicants submit that claims 1 and 14 are drawn to patentable subject matter because the claimed process applies an object model architecture to manage a telecommunications network, which is a useful, concrete, and tangible result (i.e., the object models are used to build a network management configuration object model). Reconsideration and withdrawal of these rejections is respectfully requested.

Claim Rejections – 35 U.S.C. §103

(i.) Claims 1-4, 14 and 15

Claims 1-4, 14 and 15 were rejected under 35 U.S.C. §103(a) as being unpatentable over Ismael et al. (hereinafter “Ismael”), U.S. Patent No. 6,061,721 in view of Gavrilov et al. (hereinafter “Gavrilov”), U.S. Patent No. 6,675,227. Applicants respectfully disagree and traverse these rejections for at least the following reasons.

Ismael and Gavrilov, individually or in any proper combination, fail to disclose or suggest “a base framework action interface inherited from said framework action container interface, said base framework interface object, said base framework container interface object, framework object container interface, and framework action container interface,” as recited in claims 1 and 14.

The Examiner admits, on page 5 of the Office Action, that Ismael does not explicitly teach all of the interfaces in the framework.” Yet, the Examiner attempts to overcome the admitted deficiency of Ismael by arguing that Gavrilov teaches a base framework action interface inherited from various base framework interfaces. However, the system of Gavrilov is different from the system of the claimed invention.

Gavrilov appears to disclose an object-oriented computing system in which a Java™ implementation of a service is provided dynamically at run time via a Java™ interface in accordance with the needs of a client computer in one

of two varieties: an Enterprise Java Beans™ (EJB) implementation, or, alternatively, a non-EJB implementation. However, EJB and non-EJB bean-based implementations do not have the ability to inherit an “interface” (col. 1, lines 65-66 of Gavrilov), as required by the claims of the present invention.

Further, one of ordinary skill in the art would not have been motivated to combine the teachings of Gavrilov with the teachings of Ismael with any expectation of success because Gavrilov discloses that an EJB implementation will only operate in an EJB environment (col. 2, lines 44-47), not the environment of Ismael. This illustrates a restriction to Gavrilov's system.

In the absence of any motivation, one of ordinary skill in the art would not have combined the references and then modified the resulting combination as asserted by the Examiner to obtain the claimed invention.

Accordingly, for at least these reasons, Applicants submit that claims 1 and 14, and those claims dependent thereon, are allowable. Withdrawal of these rejections are respectfully requested.

(ii.) Claims 5-13 and 16-20

Claims 5-13 and 16-20 were rejected under 35 U.S.C. §103(a) as being unpatentable over Ismael in view of Gavrilov and further in view of Hillard et al. (hereinafter “Hillard”), U.S. Patent 6,697,856. Applicants disagree and traverse these rejections for at least the following reasons.

Applicants note that these claims depend on claim 1 or 14. Ismael or Gavrilov, individually or in combination, neither discloses nor suggests the

invention found in claims 1 and 14, from which the rejected claims depend as discussed above. The disclosure in Hillard does nothing to overcome the deficiencies of the combination of Ismael and Gavrilov.

Accordingly, Applicants respectfully submit that Ismael, Gavrilov and Hillard, individually or in combination, do not render obvious claims 5-13 and 16-20 for at least the reasons discussed above with regard to independent claims 1 and 14. Reconsideration and withdrawal of the pending rejections and allowance of claims 5-13 and 16-20 are respectfully requested.

Conclusion

Pursuant to 37 C.F.R. §§ 1.17 and 1.136(a), Applicant(s) hereby petition(s) for a two (2) month extension of time for filing a reply to the outstanding Office Action and submit the required \$450.00 extension fee herewith.

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact John E. Curtin at the telephone number of the undersigned below.

In the event this Response does not place the present application in condition for allowance, applicant requests the Examiner to contact the undersigned at (703) 668-8000 to schedule a personal interview.

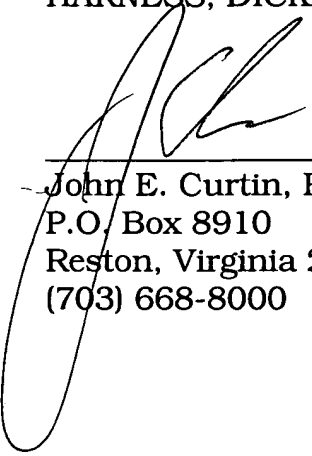
If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit

Account No. 08-0750 for any additional fees required under 37 C.F.R. § 1.16 or under 37 C.F.R. § 1.17; particularly, extension of time fees.

Respectfully submitted,

HARNESS, DICKEY, & PIERCE, P.L.C.

By



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